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January 26, 2022

By ECF:

The Honorable Gabriel W. Gorenstein
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Hearst Communications State Right of Publicity Statute Cases*,
Case No. 1:21-cv-08895-RA-GWG (S.D.N.Y.)

Dear Judge Gorenstein

I represent the Plaintiffs in the above-referenced action. I write pursuant to the Court's January 20, 2022 Order (the "Order") (ECF No. 31) to respond to the Court's questions.

First, it was and is the parties' intention that the stipulation to consolidate (ECF No. 28) would vacate the various requirements of ECF No. 22, and thus, the parties are agreeing that discovery should be stayed pending disposition of the expected motion to dismiss the Consolidated Amended Class Action Complaint (ECF No. 29).

Second, Plaintiffs are not seeking to have the Court dispose of the motion to appoint counsel filed in 21-cv-9109 at ECF No. 16. That motion should be considered withdrawn.

Thank you for your time and consideration to this matter.

Respectfully submitted,



Philip L. Fraietta

CC: All counsel of record (via ECF)